

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Pennsylvania National Mutual Casualty
Insurance Company,

Petitioner,

v.

Everest Reinsurance Company,

Respondent.

Case No.: 1:18-mc-00653-JEJ

Consolidated Cases

Everest Reinsurance Company,

Petitioner,

v.

Pennsylvania National Mutual Casualty
Insurance Company,

Respondent.

Case No.: 1:18-mc-00656-JEJ

**EVEREST REINSURANCE COMPANY'S
MOTION FOR A STAY PENDING APPEAL**

Pursuant to Federal Rule of Civil Procedure 62, Everest Reinsurance Company (“Everest”) files this motion to stay this Court’s March 14, 2019 Order to the extent it granted the Petition of Pennsylvania National Mutual Casualty Insurance Company to Compel Arbitration, pending the appeal from that Order and an Order in a related action. With this motion, Everest also files its

Memorandum of Law in Support of its Motion for a Stay Pending Appeal, a Table of Unpublished Authorities, a Certification of Counsel in support of the Motion, a Table of Exhibits, a Certificate of Nonconcurrence, and a proposed order.

Dated: April 18, 2019

Respectfully submitted,

SAIBER LLC

By: /s/ Joseph J. Schiavone
Joseph J. Schiavone (NJ 012761989)
jschiavone@saiber.com
(Admitted pro hac vice)

Jeffrey S. Leonard (NJ 031161993)
jleonard@saiber.com
(Admitted pro hac vice)

Marc E. Wolin (PA 65437)
mwoln@saiber.com

18 Columbia Turnpike, Suite 200
Florham Park, New Jersey 07932
Tel. 973-622-3333
Fax 973-622-3349
Attorneys for Petitioner-Respondent
Everest Reinsurance Company